

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

AMANDA HYLAND,

Plaintiff

vs.

**CROWN ASSET MANAGEMENT
LLC and RAUSCH, STURM,
ISRAEL, ENERSON & HORNIK,
LLP d/b/a RAUSCH STURM,**

Defendants

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Case No. 8:20-cv-00380-SMB

UNOPPOSED MOTION TO EXTEND ANSWER DATE

TO THE JONORALE UNITED STATES DISTRICT COURT:

Defendants Crown Asset Management, LLC and Rausch, Sturm, Israel, Enerson & Hornik, LLP move the court for a three-week extension of their answer date, and in support of such motion would respectfully show the following:

1. Prior to filing this motion Defendants' attorney conferred with Plaintiff's counsel, and Ms. Car agreed to the relief requested. Therefore, this motion is unopposed.

2. Good cause exists for the granting of this motion. The undersigned attorney was formally engaged to represent both of the defendants on October 12, 2020. Unfortunately, Defendants' attorney recently was injured while bicycling to work, resulting in a broken arm that required surgery. The post-operative recovery has left him trying to catch up on existing briefing deadlines and preparation for an arbitration

trial at the end of the month. The requested extension will allow Defendants' attorney time to satisfy his Rule 11 duties in preparing a response.

3. The current answer dates for Crown Asset Management is October 20, 2020, and the current answer date for Rausch Sturm is October 19, 2020. The proposed new answer date for both would be November 9, 2020.

WHEREFORE, PREMISES CONSIDERED, Defendants pray that the Court extend their answer date and allow them until November 9, 2020 to answer or otherwise respond to Plaintiff's Complaint. Defendants further pray for all such other relief as may be just and equitable.

Respectfully submitted,

/s/ Manuel H. Newburger
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Attorney for Defendants

CERTIFICATE OF SERVICE

This is to certify that on the 17th day of October, 2020, a true copy of the above and foregoing *Motion* was served on the persons on the Service List below through the Court's ECF system.

/s/ Manuel H. Newburger

Manuel H. Newburger

Service List:

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